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February 21, 1997

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*Federal Communications Commission
Office of Secretary*

BY MESSENGER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: In the Matter of Advanced Television
Systems and Their Impact Upon the Existing
Television Broadcast Service
MM Docket No. 87-268

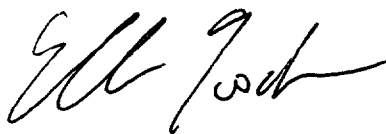
Dear Mr. Caton:

The Association for Maximum Service Television ("MSTV"), hereby notifies the Commission that Jonathan Blake, Ellen Goodman, and Victor Tawil, representing MSTV and Henry Baumann, Valerie Schulte, and Lynn Claudy, representing the National Association of Broadcasters ("NAB"), met with Blair Levin, Julius Genachowski, Roy Stewart, Bruce Franca, Dick Smith, and Saul Shapiro (by telephone) of the FCC on Tuesday, February 18, 1997. MSTV representatives met with David R. Siddall in Commissioner Ness' office later the same day. The purpose of the meetings was to discuss the allotment/assignment of DTV channels. The views of the representatives of the broadcasting industry are recorded in their comments and reply comments to the Sixth Further Notice of Proposed Rulemaking in this docket and in other public documents.

Mr. William F. Caton
February 21, 1997
Page 2

At the meeting, Mr. Levin requested a list of issues that we believe should be addressed before the completion of any reallocation of broadcast spectrum in channels 60-69. That list is attached.

Sincerely,



Ellen P. Goodman
Attorney for
Association of Maximum
Service Television, Inc.

Attachment

cc: Julius Genachowski, Esq.
Mr. Bruce Franca
Blair Levin, Esq.
Mr. Saul Shapiro
Roy Stewart, Esq.

February 21, 1997

RULEMAKING REQUIRED TO REALLOCATE CHANNELS 60-69

The FCC should undertake a rulemaking in the period between the release of the DTV allotment/assignment table and the final reallocation of channels 60-69. Execution of these tasks will ensure that the optimal amount of spectrum is available for other uses and that the DTV roll-out is not unduly compromised.

Within 120 days:

- The FCC, in consultation with the broadcasting industry and the public safety community, should identify spectrum within channels 60-69 and elsewhere that could be reallocated for public safety uses for immediate relief of public safety needs.

Within one year:

- The FCC should complete a rulemaking to determine the extent to which displaced LPTV and translator stations could be accommodated within the existing broadcast allocation.
- The FCC should rule on all pending applications for new NTSC stations and determine to what extent these new stations should be paired with DTV channels.

Within two years:

- The FCC should complete technical rules to govern the interservice sharing of up to four channels in the 60-69 range between public safety and television broadcasting.
- The FCC should analyze the results of broadcasters' field tests (for example, adjacent channel interference from full powered DTV stations to land mobile and vice versa; interference to and from full power stations) and, if appropriate, refine the DTV planning factors and make adjustments.
- The FCC should complete the necessary adjustments and regulations to accommodate Canadian and Mexican television allotments.

Within 30 months:

- The FCC should complete a rulemaking to release the remaining spectrum in channels 60-69 for other uses.